

ORIGINAL

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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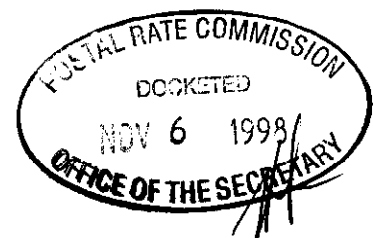
MAILING ONLINE SERVICE

Docket No. MC98-1

MOTION OF UNITED STATES POSTAL SERVICE FOR EXTENSION
OF TIME TO RESPOND TO OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORY OCA/USPS-T3-77
(November 6, 1998)

The United States Postal Service hereby moves for an extension of time to respond to Office of the Consumer Advocate interrogatory OCA/USPS-T3-77, directed to Postal Service witness Stirewalt, and filed on October 27, 1998. That interrogatory asks witness Stirewalt to update, in hardcopy and electronic format, his Mailing Online information systems capacity and cost analyses presented in attachments 1 and 2 to USPS-LR-1/MC98-1. The update should "reflect[] the current procedures for operating Mailing Online and correct[] all known errors." The interrogatory also asks that witness Stirewalt identify any procedures for operating Mailing Online that are expected to change, to the extent these procedures are reflected in his updated capacity and cost analyses.

Witness Stirewalt has not been able to obtain certain information needed to complete the updating that he is undertaking. The Postal Service therefore moves for extension, until November 10, 1998, to provide a response. The Postal Service still




hopes to respond on November 9, and believes that a one or two business day delay in providing a response will not prejudice any parties unduly.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:


Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



David H. Rubin

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



David H. Rubin

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November 6, 1998